

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF IOWA**

In re:	Chapter 11
BDC GROUP, INC.,	Case No. 23-00484
Debtor.	Hon. Thad J. Collins
	COMMITTEE’S EXHIBIT AND WITNESS LIST
	Hearing Date: October 26, 2023

The Official Committee of Unsecured Creditors (the “Committee”) of BDC Group, Inc. (the “Debtor”) submits the following Exhibit and Witness List in advance of the October 26, 2023 hearing on: (1) the Joint Motion for Relief from Automatic Stay (ECF No. 209); (2) First Interim Fee Application of Smith Gambrell & Russell (ECF No. 192); and (3) Motion to Revise, or to Amend (ECF No. 207).

EXHIBITS

Exh.	Brief Description	M A R K	O F F E R	O B J E C T	A D M I T	D A T E	DISPOSITION
201	Revised DIP Budget (ECF 126)						
202	[Placeholder] Final DIP budget						
203	[Placeholder] Accounts payable aging report						
204	[Placeholder] Accounts receivable aging report						
205	[Placeholder] Debtor’s liquidation analysis						
206	[Placeholder] Current DIP loan variance report						
207	[Placeholder] Debtor’s September 2023 monthly operating report						

*The Committee is seeking documents from the Debtor and Keystone Savings Bank relevant to the issues raised in the lift stay motion and will supplement this list if and when relevant documents are produced to the Committee.

WITNESSES

1. Dennis Bruce
2. Todd Shores
3. Designated representative of Keystone Savings Bank
4. Any witness necessary to lay foundation or authenticate evidence.
5. Any witness necessary for rebuttal or impeachment purposes.

Dated: October 12, 2023

SMITH GAMBRELL & RUSSELL LLP

By: /s/ Elizabeth L. Janczak
One of Its Attorneys

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**Admitted pro hac vice*

*Counsel for Official Committee of Unsecured
Creditors of BDC Group, Inc.*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on October 12, 2023, the *Committee's Exhibit and Witness List* was served electronically upon those parties receiving electronic notification through the Court's CM/ECF system.

/s/ Elizabeth L. Janczak